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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ENTROPIC COMMUNICATIONS,  
LLC,

Plaintiff,

v.

DISH NETWORK CORPORATION, *et  
al.*

Defendants.

Case No.: 2:23-cv-01043-JWH-KES

[Assigned to the Hon. John W. Holcomb]

**JOINT STIPULATION TO REQUEST  
APPOINTMENT OF DAVID  
KEYZER, ESQ. AS SPECIAL  
MASTER FOR DISCOVERY  
PURPOSES**

Related Case: 2:22-cv-07775-JWH-JEM

**JOINT STIPULATION TO REQUEST APPOINTMENT OF DAVID KEYZER,  
ESQ. AS SPECIAL MASTER FOR DISCOVERY PURPOSES**

1 Plaintiff Entropic Communications, LLC (“Entropic”) and Defendants DISH  
2 Network Corporation; DISH Network L.L.C.; Dish Network Service L.L.C.; and Dish  
3 Network California Service Corporation (collectively, “Defendants”) (together with  
4 Entropic, the “Parties”) hereby submit the following Joint Stipulation to Request  
5 Appointment of David Keyzer, Esq. as Special Master for discovery purposes in this  
6 case.

7 **WHEREAS**, the Court issued an order on April 21, 2023 in this matter directing  
8 the parties to meet and confer and file a stipulation proposing an individual for  
9 appointment as Special Master in this matter for the purposes of discovery [ECF 47];

10 **WHEREAS**, the Parties, following meet-and-confer efforts, have agreed that  
11 David Keyzer, Esq. is an appropriate candidate for appointment as Special Master;

12 **WHEREAS**, the Parties contacted Mr. Keyzer for the purposes of requesting a  
13 conflicts check for all named parties to these cases;

14 **WHEREAS**, Mr. Keyzer has confirmed, based on the party lists that he checked,  
15 that he does not have conflicts with any parties in this matter or the other Entropic  
16 matters for which Mr. Keyzer may serve as a Special Master;

17 **WHEREAS**, DISH Network Corporation, DISH Network L.L.C., and Dish  
18 Network Service L.L.C. (“DISH Colorado”) moved on May 8, 2023 pursuant to Rule  
19 12(b)(3) to dismiss the respective cases and claims against them [ECF 49];

20 **WHEREAS**, the Parties agree that this Joint Stipulation to Request Appointment  
21 of David Keyzer, Esq. as Special Master is entered into without waiver of and without  
22 prejudice to DISH Colorado’s pending motion to dismiss pursuant to Rule 12(b)(3) [ECF  
23 49];

1           **WHEREFORE**, the Parties hereby stipulate to request that the Court issue an  
2 order appointing David Keyzer, Esq. as Special Master for purposes of discovery. This  
3 stipulation is without waiver of and without prejudice to DISH Colorado's pending  
4 motion to dismiss pursuant to Rule 12(b)(3) [ECF 49].

5  
6 Dated: June 8, 2023

Respectfully Submitted,

7 By: /s/ Christina N. Goodrich

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Dated: June 8, 2023

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DISH NETWORK SERVICE, L.L.C., AND  
DISH NETWORK CALIFORNIA SERVICE  
CORPORATION**

**SIGNATURE CERTIFICATION**

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Christina N. Goodrich, attest that all other signatories listed above concur in this filing's content and have authorized the filing.

/s/ Christina N. Goodrich